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7 USAA CASUALTY INSURANCE COMPANY

8 **IN UNITED STATES DISTRICT COURT**
9 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

10 JEREMY R. WHITELEY,

11 Plaintiff,

12 vs.
13 USAA CASUALTY INSURANCE
14 COMPANY,

15 Defendant.

CASE NO.: 2:24-cv-00138-FLA-MAA

**DEFENDANT USAA CASUALTY
INSURANCE COMPANY'S
SEPARATE STATEMENT OF
EVIDENTIARY OBJECTIONS**

Hearing Date: March 14, 2025
Hearing Time: TBD
Crtrm.: 6B
Judge: Hon. Aenlle-Rocha
Cmplt. Filed: Jan. 5, 2024

19
20 Defendant USAA Casualty Insurance Company ("USAA CIC") respectfully
21 submits its Separate Statement of Evidentiary Objections, pursuant to the Court's
22 Initial Standing Order [Dkt. 22]:
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 Declaration of Jim Schratz, Dkt. 49 at ¶¶20, 21, 22, 23, 24, 28, 29.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 Improper expert opinion as to the interpretation of a contract. FRE 702; <i>Waller v. Truck Ins. Exch.</i> (1995) 11 Cal.4th 1, 18; <i>Aya Healthcare Services Inc. v. AMN Healthcare, Inc.</i> , 613 F.Supp.3d 1308, 1320 (S.D. Cal. 2020); <i>Aguilar v. Int'l Longshoremen's Union Local No. 10</i> , 966 F.2d 443, 447 (9th Cir. 1992); <i>Chatton v. National Union Fire Ins. Co.</i> , 10 Cal.App.4th 846, 865 (1992); <i>California Shoppers, Inc. v. Royal Globe Ins. Co.</i> , 175 Cal.App.3d 1, 35 (1985).

Dated: February 21, 2025

DKM LAW GROUP, LLP

By: /s/Jessica J. Ross

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